

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

----- X  
WENDY STARLAND,

Plaintiff,

vs.

ROB FUSARI AND ROB FUSARI  
PRODUCTIONS, INC.,

Defendants.  
----- X

CASE NO.: 2:10-cv-04930-(JLL)-  
(MAH)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the undersigned will move this Court, before Hon. Michael A. Hammer, United States Magistrate Judge, in his Courtroom at the Martin Luther King, Jr. United States Courthouse, Newark, New Jersey, at 9:30 am on November 5, 2012, or as soon thereafter as counsel may be heard, for an order pursuant to Local Civil Rule 5.3(c) sealing portions of certain Exhibits annexed to the Declaration of William Dunnegan in Support of Plaintiff's Motion for an Order Sanctioning Defendants Under Rule 37 for Intentionally Violating Two Orders of This Court (the "Dunnegan Dec."). Proposed redactions to the Exhibits to the Dunnegan Dec., as well as Proposed Findings of Fact/Conclusions of Law and a Proposed Order are attached.

Dated: October 1, 2012  
New York, NY

PROSKAUER ROSE LLP

By: s/ Sandra A. Crawshaw-Sparks

Sandra A. Crawshaw-Sparks  
Eleven Times Square  
New York, NY 10036  
(212) 969-3000

*Attorneys for Non-Party Stefani Joanne Germanotta*

To: James C. DeZao, Esq.  
Law Offices of James C. DeZao, P.A.  
322 Route 46 West  
Suite 120  
Parsippany, NJ 07054  
*Attorney for Defendant*

William Dunnegan, Esq.  
Dunnegan & Scileppi LLC  
350 Fifth Avenue  
New York, NY 10118  
*Attorney for Plaintiff*